REMARKS

Claims 1-14 are pending in this application. By the Office Action, claims 1-3 and 6-12 are withdrawn from consideration, and claims 4-5 are rejected under 35 U.S.C. §112 and §103. By this Amendment, claim 4 is amended and new claims 13-14 are added. Support for the amendments to claim 4 and new claims 13-14 can be found in the specification as originally filed, such as at page 20, line 2 to page 21, line 5, and the Examples. No new matter is edded.

I. Rejections Under §112

Claims 4-5 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Applicants respectfully traverse the rejection.

The Office Action argues that the claims are indefinite because in claim 4 the limitation "and optionally a coloring agent for color tone adjustment" makes optional the earlier required component of "a coloring agent for color tone correction." Applicants disagree.

Claim 4 recites two separate components: (1) a coloring agent for color tone *correction* and (2) an optional coloring agent for color tone *adjustment*. The element (2) a coloring agent for color tone adjustment is then made a required element in claim 5. These coloring agents are different, and are specifically defined in the specification as follows:

> ... a coloring agent for correcting the inherent emission spectrum of an insert gas (such as neon gas) characteristic of a PDP, that is, unwanted light with specific wavelengths, is called "a coloring agent for color tone correction (also referred to as a Ne light absorbing agent)"; and a coloring agent for adjusting the color tone of a displayed image to a favorite one is called "a coloring agent for color tone adjustment". Collectively, these coloring agents are also referred to simply as "coloring agents".

See specification at page 9, lines 10-17.

Furthermore, and without conceding the propriety of the rejection, claim 4 is amended to specify, in respective Markush groups, specific compounds that can be selected for the coloring agent for color tone correction and coloring agent for color tone adjustment.

Accordingly, claims 4 and 5 are not indefinite. Reconsideration and withdrawal of the rejection are respectfully requested.

II. Rejections Under §103

Claims 4-5 are rejected under 35 U.S.C. §103(a) over Yoshikawa in view of Ozawa. Applicants respectfully traverse the rejection.

Independent claim 4 is directed to an anti-reflection film for a plasma display, comprising: a transparent substrate film, an anti-reflection layer provided on one surface of the transparent substrate film, and an unwanted light shielding layer provided on the other surface of the transparent substrate film, the unwanted light shielding layer comprising: a near infrared rays absorbing layer consisting of a transparent resin and a near infrared rays absorbing agent that absorbs near infrared rays, contained in the transparent resin, and a specific-wavelength-light absorbing layer laminated to the near infrared rays absorbing layer on the side opposite to the transparent substrate film and outside the near infrared rays absorbing layer, consisting of an adhesive, and a coloring agent for color tone correction that absorbs light with specific wavelengths originating from the emission spectrum of an insert gas of a plasma display and optionally a coloring agent for color tone adjustment, contained in the adhesive. Claim 4 further specifies Markush groups of specific compounds for each of the coloring agent for color tone correction and coloring agent for color tone adjustment. Such an anti-reflection film would not have been rendered obvious by the cited references.

The Office Action cites Yoshikawa as disclosing all of the limitations of the claimed invention except for a discrete transparent resin layer that consists of a near infrared absorbing agent and an adhesive layer consisting of a coloring agent for color tone correction.

However, the Office Action asserts that Ozawa discloses a color filter having separate layers that may be provided in any order, and that it would have been obvious to thus incorporate a separate layer of a near infrared absorbing agent in a transparent resin between the substrate and layer of a coloring agent for color tone correction of Yoshikawa. Applicants disagree.

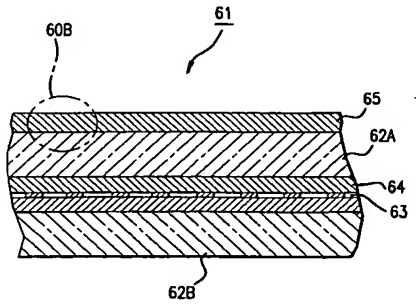
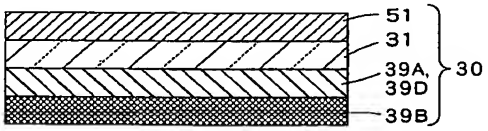
A. The References Do Not Disclose or Suggest a Separate Specific-Wavelength-Light Absorbing Layer

Yoshikawa and Ozawa at least fail to teach, suggest, or give any reason or rationale to provide that the anti-reflection film includes a separate specific-wavelength-light absorbing layer that is laminated to the near infrared rays absorbing layer on the side opposite to the transparent substrate film and is outside the near infrared rays absorbing layer, as claimed, where this specific-wavelength-light absorbing layer contains an adhesive and a coloring agent for color tone correction that absorbs light with specific wavelengths originating from the emission spectrum of an insert gas of a plasma display and optionally a coloring agent for color tone adjustment. This arrangement of the separate specific-wavelength-light absorbing layer, and the advantages provided thereby, are not disclosed or suggested by Yoshikawa or Ozawa.

Yoshikawa discloses an anti-reflection film for a plasma display. However, the arrangement and composition of the layers in Yoshikawa are different from, and would not have rendered obvious, the arrangement and composition of the layers of the claimed invention. In Yoshikawa, there is provided an anti-reflection film 65 for a plasma display that includes an adhesive layer 64. See Fig. 6a and col. 17, lines 12-27. However, the adhesive layer 64 of Yoshikawa contains *both* a near infrared rays absorbing agent *and* a coloring agent for color tone correction. Col. 18, lines 64-67 and col. 11, lines 19-24. Yoshikawa thus teaches that the light absorbing materials are contained *in the same layer*, not in two separate, laminated layers as claimed.

As such, Yoshikawa does not disclose or suggest that the specific-wavelength-light absorbing layer that contains a coloring agent for color tone correction that absorbs light with specific wavelengths originating from the emission spectrum of an inert gas of a plasma display, is positioned on the side opposite to the transparent substrate film and outside the near infrared rays absorbing layer. Nowhere does Yoshikawa disclose, or suggest, that a specific-wavelength-light absorbing layer that contains a coloring agent for color tone correction, and a near infrared rays absorbing layer, can be positioned separately and independently of one another. Yoshikawa provides no reason or rationale to support an assertion that its combined layer could instead be provided in two separate layers, and in the manner required by instant claim 4.

Instead, in Yoshikawa, the layer 64 is a single layer, where the layer includes both a near infrared rays absorbing agent and a coloring agent for color tone correction. In contrast, claim 4 specifically requires two separate layers -- one a specific-wavelength-light absorbing layer and one a near infrared rays absorbing layer -- which layers are laminated together but are not combined together as a single layer. Compare, for example, Fig. 6a of Yoshikawa having a single adhesive layer 64, to Fig. 2 of the present application having a separate specific-wavelength-light absorbing layer 39B and near infrared rays absorbing layer 39A:

Yoshikawa	Present Application
 FIG.6a	 FIG.2

See also the present specification at page 8, lines 7-19.

Thus, Yoshikawa does not disclose two separate and distinct specific-wavelength-light absorbing layer and near infrared rays absorbing layer, as claimed, but at most only discloses a single, mixed layer. Further, nowhere does Yoshikawa provide any reason or rationale for one of ordinary skill in the art to have taken the disclosed single adhesive layer, which contains both a near infrared rays absorbing agent and a coloring agent for color tone correction, and instead provided those materials in separate layers as claimed. Yoshikawa does not indicate how such a separation of the materials from the single unitary adhesive layer could be accomplished while still providing a workable product. Nor does Yoshikawa provide any suggestion that such separate layers could or should be used for any reason. Thus, Yoshikawa would not have rendered obvious the claimed invention.

Ozawa does not overcome the deficiencies of Yoshikawa. Ozawa is cited as disclosing a color filter having separate layers that may be provided in any order, and the Office Action asserts that it would have been obvious to incorporate a separate layer of a near infrared absorbing agent in a transparent resin between the substrate and layer of a coloring agent for color tone correction of Yoshikawa.

However, Ozawa does not disclose, and would not have led one skilled in the art, to have separated the single layer of Yoshikawa to instead provide two separate layers of a specific-wavelength-light absorbing layer and near infrared rays absorbing layer, as claimed. Nor does Ozawa disclose that the specific-wavelength-light absorbing layer should specifically be positioned on the side opposite to the transparent substrate film and outside the near infrared rays absorbing layer, as claimed. Ozawa is silent about the specific order of such layers, and thus the Office Action bases the rejection only on a hindsight reconstruction of the claimed invention using the instant claims as a roadmap. Ozawa teaches different layers for different purposes, and provides no reason or rationale for one of ordinary skill in the art to have increased the number of layers in Yoshikawa and then locate those layers in

the manner necessary to arrive at the claimed invention with any reasonable expectation of success.

Thus, Yoshikawa and Ozawa, alone or combined, would not have rendered obvious the claimed invention.

B. The References Do Not Disclose or Suggest The Claimed Coloring Compounds

Claim 4 also specifies specific compounds for each of the coloring agent for color tone correction and coloring agent for color tone adjustment. However, Yoshikawa and Ozawa further fail to teach, suggest, or give any reason or rationale to provide the anti-reflection film that includes the specifically identified compounds.

Yoshikawa is completely silent as to any specific compounds that might even correspond to the coloring agent for color tone correction and coloring agent for color tone adjustment. Yoshikawa only mentions coloring agents in one instance, and then only by generally stating that "[t]he EVA adhesive layer may further include, in small amounts, ultraviolet absorbing agent, infrared absorbing agent, antioxidant, paint processing aid, and/or coloring agent." Col. 11, lines 19-22. While Ozawa is more directed to coloring agents, Ozawa in fact is specifically directed to a filter that requires the presence of a very particular dipyrazolylsquarylium dye. See Ozawa at Abstract.

Together, even if combined, Yoshikawa and Ozawa further fail to teach, suggest, or give any reason or rationale to provide an anti-reflection film that includes the specifically identified compounds. That is, the references do not disclose or render obvious that the anti-reflection film includes a coloring agent for color tone correction that comprises at least one selected from the group consisting of anthraquinone, phthalocyanine, methine, azomethine, oxazine, azo, styryl, coumarin, porphyrin, dibenzofuranone, diketopyrrolopyrrole, rhodamine, xanthene, pyrromethene dyes, and mixtures thereof, and that the coloring agent for color tone

adjustment (optional in claim 4 but required in claim 5) comprises at least one selected from the group consisting of monoazo pigments; quinacridone; thioindigo Bordeaux; perylene maroon; aniline black; red oxide; chromium oxide; cobalt blue; ultramarine; carbon black; indigoid dyes; carbonium dyes; quinoline dyes; nitroso dyes; naphthoquinone dyes; perinone dyes; rhodamine, porphyrin, cyanine, squarilium, azomethine, xanthene, oxonol, and azo compounds that show the maximum absorption at a wavelength of 560 to 620 nm; cyanine compounds, merocyanine compounds, oxonol compounds, methine compounds such as arylidene or styryl compounds, anthraquinone compounds, quinone compounds, diphenylmethane dyes, triphenylmethane dyes, xanthene dyes, azo compounds, and azomethine compounds that absorb light in a wave range of 380 to 440 nm; and cyanine, squarilium, azomethine, xanthene, oxonol, azo, anthraquinone, triphenylmethane, xanthene, copper phthalocyanine, phenothiazine, and phenoxazine compounds that absorb light in a wave range of 640 to 780 nm; and mixtures thereof.

Thus, for this additional reason, Yoshikawa and Ozawa, alone or combined, would not have rendered obvious the claimed invention.

C. The Claimed Invention Provides Unexpected Results

Furthermore, the claimed structure provides significant and unexpected results that are also not taught or suggested by Yoshikawa and Ozawa. In the claimed invention, a separate specific-wavelength-light absorbing layer that is laminated to the near infrared rays absorbing layer on the side opposite to the transparent substrate film that absorbs light with specific wavelengths originating from the emission spectrum of an insert gas of a plasma display, is positioned on the side opposite to the transparent substrate film. This separate specific-wavelength-light absorbing layer is not part of, but rather is laminated to, the near infrared rays absorbing layer. As a result, these two separate but laminated layers can be provided independently in the process of forming an anti-reflection film for a plasma display.

According to the claimed invention, therefore, the near infrared rays absorbing layer absorbs near infrared rays, but does not have specific properties of transmittance or tone correction. As such, the physical properties of the near infrared rays absorbing layer can be fixed. Instead, if adjustment of the transmittance or color tone correction is required, such changes can be made simply by adjusting the properties of the specific-wavelength-light absorbing layer, without needing to also alter the properties of the near infrared rays absorbing layer. This allows such changes to be easily and safely made, by simply adjusting an outer layer of the structure.

The claimed invention thus allows and provides for easy and secure adjustment of the transmittance and color tone correction properties. This provides the benefit, for example, of allowing multiple different specific-wavelength-light absorbing layers to be prepared with a range of properties, and then the desired or suitable specific layer can be used for a specific application. See, for example, specification at page 6, lines 21-28.

In contrast, Yoshikawa does not provide for easy and secure adjustment of the transmittance and color tone correction properties. In Yoshikawa, adjustment of these properties necessarily affects the near infrared rays absorbing layer. Adjustment of the properties thus also requires adjustment of the near infrared rays absorbing layer. Yoshikawa does not teach or suggest, and provides no reason or rationale for, modifying its unitary structure to instead provide two separate laminated layers, in the manner as claimed.

D. Conclusion

Yoshikawa and Ozawa thus do not disclose or suggest at least these features of the claimed invention, and thus would not have rendered obvious independent claim 4, or claim 5 dependent therefrom. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

III. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

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